

UNITED STATES DISTRICT COURT

for the

District of Massachusetts

Milca Bentez Calves, Guillermo Calves
 Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Mark Calandrix, Foral Trust business et al
 Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

1:25-cv-0
 (to be filled in by the Clerk's Office)

Jury Trial: (check one)



Yes



No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

Milca Bentez Calves, Guillermo Calves
66-3 Hartford Avenue Providence,
Rhode Island 02909-5919
(978) 831-4927
comunicacion@phod.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name
 Job or Title (if known)
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address (if known)

MARK C. MANDIX
 Funeral Trust business
 74 Boston Post Road
 Madison, Connecticut
 CT 06443
 800-336-1102
 info@LFFM.com

Defendant No. 2

Name
 Job or Title (if known)
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address (if known)

First State Trust Company
 Funeral Services
 74 Boston Post Road
 Madison, Connecticut
 CT 06443
 800-336-1102
 info@LFFM.com

Defendant No. 3

Name
 Job or Title (if known)
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address (if known)

Citigroup Rhode Island
 Funeral Services Escrow Account
 74 Boston Post Road
 Madison, Connecticut
 CT 06443
 800-336-1102
 info@LFFM.com

Defendant No. 4

Name
 Job or Title (if known)
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address (if known)

Pennecid & Perpetual Care Fund
 Manager
 74 Boston Post Road
 Madison, Connecticut
 CT 06443
 800-336-1102
 info@LFFM.com

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☐

Federal question

☒

Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

28 U.S.C. § 1331 Code - Federal Question.

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) *Michael B. Calves, Gullwings*, is a citizen of the State of (name) *Rhode Island Pro-se*

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, (name) *Mark C. Magnix*, is a citizen of the State of (name) *Connecticut*. Or is a citizen of (foreign nation) *U.S.*

b. If the defendant is a corporation

The defendant, (name) MARK C. Mannix, is incorporated under the laws of the State of (name) Connecticut, and has its principal place of business in the State of (name) Connecticut.

Or is incorporated under the laws of (foreign nation) RF# RI 421973, and has its principal place of business in (name) 74 Boston Post Road Wallingford CT 06443.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy-the amount the plaintiff claims the defendant owes or the amount at stake-is more than \$75,000, not counting interest and costs of court, because (explain):

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

On May 9, 2025 my tenant, Pedro Martinez fell seriously ill. His wife asked me to go to Bell Funeral Home, I signed as an emergency person as "sister of the congregation" an "authorization to Embalm" and the defendants took my signature and ID and made a "Individual Trust Agreement by Cooperative Funeral Fund, Inc. with First State Trust Company Citigroup" in the RI Funeral Services Escrow Account as May 19, 2025. "Irrevocable"

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

We ask the honorable Court cancel this fraudulent and unauthorized "Individual Trust Agreement by Cooperative Funeral Fund, Inc. Irrevocable" and the honorable Juez orders this Cooperative Fund, Inc. pay the "Caceres Family" the funds fraudulently withheld for 20 years and that in this false "Individual Trust Agreement" they fraudulently managed to make Irrevocable.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: May 27, 2025

Signature of Plaintiff

Printed Name of Plaintiff

Mirra Benitez Caceres

MIRRA BENITEZ CACERES

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

UNITED STATES DISTRICT COURT

DISTRICT OF RHODE ISLAND

(Providence)

Mirca Benitez Caceres

Case no. 1:25-00

Guillermo Caceres

v.

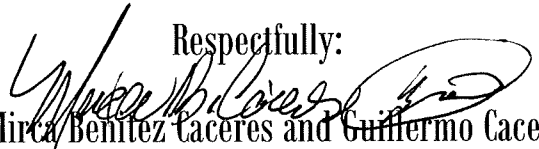
Mark C. Mannix, Funeral trust business et, al

Cooperative Funeral Funds, Inc. et, al First state trust company/Citigroup in the Rhode Island Funeral Services Escrow Account. Preneed & Perpetual care fund Management.

COMPLAINT

Now comes the plaintiff, Mirca Benitez Caceres and Guillermo Caceres, the plaintiff's who hereby move to asking this honorable court to ask the defendant to provide us with the information how my signature for my tenant's emergency contact at Bell Funeral Home, Inc. turned into fraudulent "individual trust agreement has been received by cooperative Funeral Fund Inc. and the funds are deposited with first State Trust Company/Citigroup in the RI Funeral Services Escrow Account as of May 19, 2025.

Respectfully:


Mirca Benitez Caceres and Guillermo Caceres

661 Hartford Avenue Providence, RI 02909

INTRODUCTION

On May 2025 a tenant who lives on the second floor (661 Hartford Avenue Providence, RI 02909) Pedro Martinez, also my client to whom I give four hours of care (PCA) with the Forgery Center Agency, who is in very poor health, due to delicate condition, Belkis Cristobal Martinez (wife) and I, went to bell funeral home on Broad St Providence, RI to ask how much the funeral service would cost since they do not have life insurance or any funeral plan, she told us that the total was \$10,000 including the cost of burial in Warwick. On May 9, 2025, the wife of Mr. Pedro Martinez who is still in Rhode Island Hospital (Brown Hospital) asked me to accompany her to the funeral home to make a deposit and when Pedro Martinez Passed away we would take the remaining money, in total we gave \$1,500 dollars to Bell Home Funeral Home, the secretary when delivering the receipt tells us that she needs an emergency contact and asks me if I am Pedro Martinez's family, I tell her no, I am a sister of the church and I known him for many years, I give her my AID and sign as the contact person, the defendants took my identification and my signature and made an irrevocable Individual Trust and put Mr. Pedro Martinez as my relative since we live at the same address 661-3 Hartford Avenue Providence RI 02909. Exhibit 1

JURISDICTION

28 U.S. Code & 1331-Federal question.

This court processes jurisdiction over this case because the district court shall have original jurisdiction of all civil actions arising under constitution, laws, or treaties of the United States.

STATEMENT OF THE ISSUES

Whether the district court has information (note) where we have reported that the State of Rhode Island, P.O. Box 8709 Cranston, RI 02920-8787 I have been linked as the “wife” and Mother of Mr. Pedro Martinez, we have gone in person with our ID and they do not correct the error, until finally they make a false “irrevocable” document linking me to a 70 year old man who is not my relative and who is only my tenant and I am his PCA four hours a day (Agency Fogerty Center). Due to the false “trust agreement” made by our employment agency, Fogerty Center I appoint a “Representative Trustee” “Representative Client” since supposedly when I signed as emergency contact person at bell Funeral Home, Human Resources and Rhode Island Hospital (Brown Hospital) I did not sign a false trust agreement for Pedro Martinez who is still alive, and now those corporations, cooperatives and foundations will continue to manage illegally our properties and assets as they have done for 20 years without giving us a dollar of what legally belongs to us, this time “irrevocable” without our authorization.

If I were to make a trust, I would do it for my children Jonathan David Caceres, Israel David Caceres, Abraham David Caceres, my Husband Guillermo Caceres and my granddaughter Alya Caceres and my Grandson Keenen Caceres and daughter - in - law Adriana Caceres. We have not even been able to do this because we brought the property on September 7, 2005 and on January 13, 2006 it was usurped and we have not received justice for 20 years even though we have paid more than \$10,000 in Estatal Taxes annually for 20 years. This false agreement is the same one registered in BK: 7385 PG0145 Plat 114-138-000 and BK: 7385 PG 0164 plat 114-139-000 plat card 776. The same administratrix, the difference is this new false agreement is a type of trusted that doesn't have to go to probate court when Pedro Martinez dies, and they don't have to give me a single dollar and its "irrevocable" we demand justice.

ARGUMENT

The final prong is whether this complaint there is dispute that the same people involved in many cases (King Case) Plat Card 776, 661 Hartford Avenue Providence, RI 02909 (“the property”)

CONCLUSION

For the reasons stated above, plaintiff’s urges the court cancel this irrevocable “Individual trust Agreement. Exhibit A

Dated: May 27, 2025

Respectfully Submitted,

Mirca Benitez Caceres,

Guillermo Caceres,

661 Harford Avenue

Providence RI 02909.

CERTIFICATE OF SERVICE

I, Mirca Benitez Caceres, hereby certify that on May 28, 2025 I electronically filed the foregoing document with the clerk of court using the electronic filing system, which will send notification of such filing to all registered electronic filing participants. I also certify that on the same date, I caused the mailing of the document by United States Postal Service, via first class mail, postage pre-paid, to the following:

Cooperative Funeral Fund. Inc

Mark C. Mannix, Funeral Trust Business

First State trust Company/Citigroup in the Rhode Island Funeral Services Escrow Associates (FST)

Cooperative Funeral Fund. Inc.

Preneed & Perpetual Care Fund management CFF

74 Boston Post Road Madison, Connecticut 06443

Very truly,

Mirca Benitez Caceres

Guillermo Caceres

May 28, 2025